

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
GPIF-I EQUITY CO., LTD. and  
GPIF-I FINANCE CO., LTD.,

Plaintiffs-Counterclaim Defendants,

v.

HDG MANSUR INVESTMENT SERVICES, INC.,  
HDGM ADVISORY SERVICES, LLC, and  
HAROLD D. GARRISON

Defendants-Counterclaim Plaintiffs.  
-----X

HDG MANSUR INVESTMENT SERVICES, INC.,  
and HDGM ADVISORY SERVICES, LLC,

Third-Party Plaintiffs,

v.

HSBC SECURITIES (USA) INC.

Third-Party Defendant.  
-----X

Case No. 13 Civ 547 (CM)

**NOTICE OF MOTION  
TO DISMISS THE  
THIRD-PARTY COMPLAINT**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of HSBC Securities (USA) Inc.'s Motion to Dismiss the Third-Party Complaint, third-party defendant HSBC Securities (USA) Inc. will move this Court before the Honorable Colleen McMahon, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined, for an Order granting its motion to dismiss the third-party complaint asserted by third-party plaintiffs HDG Mansur Investment Services, Inc. and HDGM Advisory Services, LLC.

Dated: New York, New York  
March 11, 2013

WILMER CUTLER PICKERING  
HALE AND DORR LLP

By: /s/ Charles C. Platt  
Charles C. Platt  
Jeremy S. Winer  
7 World Trade Center  
250 Greenwich Street  
New York, New York 10007  
Tel: (212) 230-8800  
Fax: (212) 230-8888

*Attorneys for Third-Party Defendant HSBC  
Securities (USA) Inc.*